

1 M. ELIZABETH DAY (SBN 177125)
eday@feinday.com
2 DAVID ALBERTI (SBN 220265)
dalberti@feinday.com
3 MARC BELLOLI (SBN 244290)
mbelloli@feinday.com
4 FEINBERG DAY ALBERTI LIM &
BELLOLI LLP
5 1600 El Camino Real, Suite 280
Menlo Park, CA 94025
6 Tel: 650.618.4360
Fax: 650.618.4368
7
8 NI, WANG & MASSAND, PLLC
Hao Ni (pro hac vice)
hni@nilawfirm.com
9 8140 Walnut Hill Lane, Suite 500
Dallas, TX 75231
10 Telephone: (972) 331-4600
Facsimile: (972) 314-0900
11

Attorneys for Plaintiff
Hypermedia Navigation LLC

COOLEY LLP
Heidi L. Keefe (178960)
(hkeefe@cooley.com)
Mark R. Weinstein (193043)
(mweinstein@cooley.com)
Lowell D. Mead (223989)
(lmead@cooley.com)
Daniel J. Knauss (267414)
(dknauss@cooley.com)
Azadeh Morrison (311046)
(amorrison@cooley.com)
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000
Facsimile: (650) 849-7400

Attorneys for Defendant
FACEBOOK, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

17 HYPERMEDIA NAVIGATION LLC,
18 Plaintiff,
19 v.
20 FACEBOOK, INC.,
21 Defendant.

Case No. 4:17-cv-05383-HSG

**STIPULATION AND REQUEST TO
EXTEND DEADLINE TO AMEND
THE PLEADINGS**

Plaintiff, Hypermedia Navigation LLC (“Plaintiff”) and Defendant Facebook, Inc. (“Defendant”), hereby stipulate and respectfully request that deadline to amend the pleadings, currently set for June 29, 2018, be extended until fourteen (14) days from the date the Court decides Defendant’s § 101 motion on the Patents-in-Suit. The Parties previously agreed that Plaintiff would add U.S. Patent Nos. 9,772,814 and 9,864,575 in an amended complaint only if the Court denied that motion. The Parties have also agreed to include these two patents in their infringement and invalidity contentions under the Patent Local Rules for the purpose of avoiding disruptions to the case schedule if those patents are added. As the 101 motion is pending and today is the last day to amend the pleadings without leave, the parties respectfully submit that the deadline for Plaintiff to amend to add these two patents should be extended and tied to the Court’s pending decision on the § 101 motion.

Thus, pursuant to this stipulation, the parties therefore respectfully request the Court enter the accompanying proposed order extending the deadline to amend the pleadings in this case as set forth above.

NI, WANG & MASSAND, PLLC

Dated: June 29, 2018

By: /s/ Hao Ni
Hao Ni

**Attorney for Plaintiff
Hypermedia Navigation LLC**

Dated: June 29, 2018

COOLEY LLP

By: /s/ Daniel J. Knauss
Daniel J. Knauss

**Attorneys for Defendant
Facebook, Inc.**

FILER'S ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, Hao Ni, attest that concurrence in the filing of this document has been obtained.

Dated: June 29, 2018

/s/ Daniel J. Knauss

Daniel J. Knauss